



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

SFUND RECORDS CTR  
2067350

August 31, 1998

Mr. Robert Pender  
Environmental Restoration Branch  
EFA, West  
Naval Facilities Engineering Command  
900 Commodore Drive, Code 1824.3  
San Bruno, CA 94066-5006

Dear Mr. Pender:

EPA has reviewed the "Draft Technical Memorandum, Human Health Risks from Exposure to Residual PCBs" for Mare Island. The comments provided below should be addressed in a revised document.

- 1) The purpose of this document is unclear. The objectives of this study should be discussed with the project team, including toxicologists from the regulatory agencies.
- 2) Page 2; EPA agrees with the Navy's conclusion that for PCB locations "within an existing IR or Group II and III site, the analytical results from the confirmation samples will be incorporated into the data set used for the HHRA to address potential additive effects from exposure to multiple chemical contaminants, including the residual PCBs, at a site." However, the following two exceptions should also apply: a) if any of the PCB sites is slated for daycare or child education center under the reuse plan, the 10 mg/kg screening level is not appropriate, and b) any sites with potential ecological receptors must be addressed under the Onshore Ecological Risk Assessment.
- 3) Page 6; Within the last several years, EPA has reassessed the toxicity information for PCBs. New scientific data used in this reassessment supports 100% gastrointestinal absorption and identifies that PCBs are readily absorbed in the lungs thus supporting the use of 100% lung absorption. We would encourage the Navy to have proactive discussions prior to submittal of all Technical Memorandum. In this case EPA input on the current science on PCBs could have avoided the additional risk calculation.

Dr. Sophia Serda, EPA Toxicologist, also reviewed this document and aided in the preparation of these comments. If you have any questions regarding these comments, I can be reached at (415)744-2368.

Sincerely,

Bonnie Arthur  
Remedial Project Manager

cc: Mr. Chip Gribble, DTSC  
Mr. Michael Rochette, RWQCB